

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) NANCY MORRISON

Plaintiff,

v.

(1) CHARTIS PROPERTY CASUALTY CO., a foreign corporation,

Defendant.

Case No. 13-CV-116-JED-PJC

PRIVILEGE LOG

Bates Range	Document Type	Date	Author (Atty Author Denoted by *)	Recipients	General Subject Matter	Privilege Asserted
Claim File 379-385	Email/letter/summary	12/28/12	Dan S. Folloo*	Brittan Reed	Report on underlying litigation and summary opinion of Plaintiff's deposition testimony.	Attorney/client privilege and work product.
386-423	Email and letter	11/6/12	Dan S. Folloo*	Brittan Reed	Report and opinion on underlying litigation, legal advice concerning state of law under UM statute and subrogation; Plaintiff's deposition testimony.	Attorney/client privilege and work product.

EXHIBIT

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424-425	Email and letter	9/26/12	Dan S. Folluo*	Brittan Reed	Legal advice concerning medical record authorizations and independent medical reviews.	Attorney/client privilege and work product.
426-428	Email and letter	9/10/12	Dan S. Folluo*	Brittan Reed	Report and opinion on underlying litigation; legal advice concerning intervention.	Attorney/client privilege and work product.
429-437	Email/letter/pleadings	8/21/12	Dan S. Folluo*	Brittan Reed	Report and opinion on underlying litigation; legal advice concerning insurer's right to subrogation.	Attorney/client privilege and work product.
438-439	Email and letter	8/22/12	Dan S. Folluo*	Brittan Reed	Legal advice concerning intervention rights, litigation discovery and subrogation.	Attorney/client privilege and work product.
445-450	Email and letter	8/16/12	Dan S. Folluo*	Brittan Reed	Legal opinion and advice concerning state of case law relative to UM subrogation and litigation discovery issues.	Attorney/client privilege and work product.
451-452	Email and letter	8/15/12	John H. Tucker*	Brittan Reed and Dan S. Folluo*	Retention of law firm to provide legal advice.	Attorney/client privilege and work product.
453-473	Email/report/photographs	8/13/12	Brittan Reed	Brian Mack	Request for documents to assist in defense anticipated lawsuit.	Work product.
735	Email	8/13/12	John H. Tucker*	Brittan Reed	Response to request for legal advice.	Attorney/client privilege and work product.

891-895	Email/letter and attachment	1/31/13	Mary L. Henderson on behalf of Dan S. Folloo*	Brittan Reed	Medical records, retrieval issues.	Attorney/client privilege and work product.
923	Claim note entry and email	2/25/13	Brittan Reed/ Dan S. Folloo*	Brittan Reed	Outside legal counsel's report and opinion on underlying litigation.	Attorney/client privilege and work product.
923	Claim note entry – copying email from legal counsel	2/21/13	Brittan Reed/ Dan S. Folloo*	Brittan Reed/ Randall E. Long*/Mary Henderson/ Teresa Ray	Report and opinion on underlying litigation, legal advice concerning right to subrogation.	Attorney/client privilege and work product.
924	Claim note entry – copying email from legal counsel	2/19/13	Brittan Reed/ Dan S. Folloo*	Brittan Reed	Report on underlying litigation.	Attorney/client privilege and work product.
924	Claim note entry	1/7/13	Brittan Reed	-	Discussion of payment of expenses to outside legal counsel	Work product.
924	Claim note entry	12/17/12	Brittan Reed	-	Summary of legal advice and statements by outside legal counsel relative to medical records authorization.	Attorney/client privilege and work product.
925	Claim note entry – copying email from defense counsel	12/17/12	Brittan Reed/ Dan S. Folloo*	Brittan Reed	Report and opinion on underlying litigation.	Attorney/client privilege and work product.
925	Claim note entry	12/10/12	Brittan Reed	-	Summary of outside legal counsel's report and opinion regarding underlying litigation and advice of medical records authorization.	Attorney/client privilege and work product.

925	Claim note entry	12/3/12	Brittan Reed	-	Entry regarding involvement of defense counsel and monitoring of underlying lawsuit, status of same.	Attorney/client privilege and work product.
925-926	Claim note entry – copying email from outside legal counsel	11/7/12	Brittan Reed/ Dan S. Folluo*	Brittan Reed	Report and opinion regarding underlying lawsuit, legal advice relative to liability limit tenders and subrogation.	Attorney/client privilege and work product.
926	Claim note entry	11/6/12	Brittan Reed	-	Summary of discussion with outside legal counsel relative to his opinion of underlying litigation.	Attorney/client privilege and work product.
926	Claim note entry	11/6/12	Brittan Reed	-	Email to outside legal counsel concerning legal advice on closing claims and report/opinion on underlying litigation.	Attorney/client privilege and work product.
926	Claim note entry – copying email from outside legal counsel	9/26/12	Brittan Reed/ Dan S. Folluo*	Brittan Reed	Legal advice concerning medical records authorization and independent medical reviews.	Attorney/client privilege and work product.
926	Claim note entry	9/25/12	Brittan Reed	-	Summary of discussion with outside legal counsel relative to medical records authorization, independent medical	Attorney/client privilege and work product.

				examinations and state of the law relative to insurer bad faith.
926-927	Claim note entry – copying email from outside legal counsel	9/10/12	Brittan Reed/ Dan S. Folloo*	Brittan Reed Legal counsel's report and opinion on underlying litigation, independent medical examinations and legal advice concerning insurer's right to intervention in underlying litigation.
927	Claim note entry	8/30/12	Brittan Reed	- Summary of discussion with legal counsel regarding claim and communication with insured's counsel
930	Claim note entry	8/20/12	Brittan Reed	- Summary of discussion with outside legal counsel concerning legal rights to subrogation in UIM context.
930	Claim note entry	8/15/12	Brittan Reed	- Summary of discussion with outside legal counsel concerning state of case law on uninsured motorist insurance, insurer bad faith and subrogation.
930	Claim note entry	8/13/12	Brittan Reed	- Summary of email from outside legal counsel concerning retention of product.

930-931	Claim note entry	8/13/12	Brittan Reed	-	firm for legal advice.
					Summary of discussion with outside legal counsel, John H. Tucker regarding status of Oklahoma UM law and status of insurer bad faith law.
931	Claim note entry	8/13/12	Brittan Reed	-	Summary of discussion with attorney John H. Tucker and legal advice regarding state of UM law and bad faith.
931	Claim note entry	5/15/12	Brittan Reed	-	Setting Reserves
934	Claim note entry	9/9/11	Brittan Reed	-	Setting Reserves
936	Claim note entry	9/1/11	Brittan Reed	-	Setting Reserves
937	Claim note entry	8/31/11	Brittan Reed	-	Setting Reserves
939	Claim note entry	8/23/11	Brittan Reed	-	Setting Reserves
CHARTIS - 841	Reserves transaction history	No date	(computer report)	-	Setting Reserves
					Confidential/ Proprietary

Respectfully submitted,

By


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